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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

This Document Relates To:

ALL ACTIONS

**OMNIBUS SEALING STIPULATION
REGARDING THE PARTIES' JOINT
LETTER BRIEF ON WHETHER
TIKTOK MUST PRODUCE SPECIFIED
PERSONNEL MATERIALS FOR
DEPONENTS**

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court's Order Setting Sealing Procedures (Dkt. 341), Defendants TikTok Inc., ByteDance Inc., TikTok Ltd., ByteDance Ltd., and TikTok LLC (the "TikTok Defendants") and the PI/SD Plaintiffs ("Plaintiffs") submit this Omnibus Sealing Stipulation Regarding the Parties' Joint Letter Brief on Whether TikTok Must Produce Specified Personnel Materials for Deponents (Dkt. 1126) (the "Joint Letter Brief").

On September 10, 2024, the Parties filed a Joint Letter Brief on Whether TikTok Must Produce Specified Personnel Materials for Deponents (Dkt. No. 1126) (the "JLB"), as well as a Joint Temporary Sealing Motion requesting to file under seal limited portions of the JLB.

The Parties agree that the following portions of the JLB should remain sealed:

Paragraphs to Be Sealed	Basis for Sealing
Portion of Footnote 7	This footnote names an employee who is not a party to this lawsuit and discusses that employee's performance reviews and bonus information. Only the name of the employee should be sealed.

No party has previously sought to seal the documents or information sought to be sealed.

The Parties agree that the portions of the Joint Letter Brief not listed in the above chart may be unsealed. The TikTok Defendants do not waive, and expressly reserve, their right to move to seal other material from, or derived from, documents quoted, paraphrased, characterized, or otherwise cited in the Joint Letter Brief. The confidentiality or appropriateness of sealing material other than cited portions of the Joint Letter Brief is not currently at issue, and the TikTok Defendants do not waive any right with respect to that material.

Pursuant to this case's sealing procedures, the following are attached hereto: (i) the Declaration of Noreen Yeh supporting the requests to seal; (ii) a Proposed Order on Undisputed Sealing Requests; and (iii) a modified redacted version of the Parties' Joint Letter Brief on Whether TikTok Must Produce Specified Personnel Materials for Deponents.

IT IS SO STIPULATED, through Counsel of Record.

Dated: January 30, 2025

Respectfully submitted,

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By: /s/ Geoffrey M. Drake

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ATTESTATION

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 30, 2025

By: /s/ Geoffrey M. Drake
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